

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO, et al.,§	§	CIVIL ACTION NO.
Plaintiffs,	§	
	§	
v.	§	5:21-CV-0844-XR
	§	
STATE OF TEXAS, et al.,	§	[Consolidated Action: Lead Case]
Defendants.	§	

**DEFENDANT TORIBIO “TERRY” PALACIOS’
RULE 26(a)(3) PRETRIAL DISCLOSURES**

TO THE HONORABLE COURT:

Defendant Toribio “Terry” Palacios, in his official capacity as Hidalgo County Criminal District Attorney (“Defendant Palacios”), pursuant to the Second Amended Scheduling Order entered on March 30, 2023 (ECF No. 579), and Rule 26(a)(3) of the Federal Rules of Civil Procedure, makes his pretrial disclosures. Defendant reserves the right to amend his disclosures to include witnesses or exhibits that they could not have reasonably anticipated to be necessary, or to respond to amendments to the other parties’ disclosures made under Rules 26(a)(3)(A)(i)-(iii).

A. WITNESSES (Rule 26(a)(3)(A)(i))

Witnesses Defendant Palacios expects to present:

None

Witnesses Defendant Palacios will call if the need arises:

None.

The following witnesses will testify, if necessary, regarding attorneys’ fees and costs:

Victor M. Garza, Attorney Fees Expert
Josephine Ramirez-Solis, Attorney Fees Expert
c/o Hidalgo County Criminal District Attorney’s Office
Civil Litigation Division
100 E. Cano
Edinburg, TX 78539

B. DESIGNATIONS OF DEPOSITION TESTIMONY (Rule 26(a)(3)(A)(ii))

None. However, the Defendant Palacios reserves the right to offer portions of the deposition of any witness that the opposing parties may designate pursuant to Rule 26(a)(3)(A)(ii). *See* Fed. R. Civ. P. 32(a)(6).

C. DOCUMENTS AND OTHER EXHIBITS (Rule 26(a)(3)(A)(iii))

Documents and other exhibits Defendant Palacios expects to offer:

None.

Documents and other exhibits Defendant Palacios will offer if the need arises:

None.

Respectfully submitted,

TORIBIO “TERRY” PALACIOS
CRIMINAL DISTRICT ATTORNEY
HIDALGO COUNTY, TEXAS

/s/ Jacqueline Villarreal

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ATTORNEY FOR DEFENDANT
TORIBIO “TERRY” PALACIOS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on July 28, 2023, with the clerk of court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Jacqueline Villarreal
Assistant District Attorney